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## UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization Service Changes, 2012

Docket No. N2012-1

## PRESIDING OFFICER'S INFORMATION REQUEST NO. 7

(Issued April 13, 2012)

The Postal Service is requested to respond to the following questions to clarify the record on its request for an advisory opinion under 39 U.S.C. 3661(c) regarding the Mail Processing Network Rationalization Service Changes, 2012 (MPNR). In order to facilitate inclusion of the requested material in the evidentiary record, the Postal Service shall have a witness attest to the accuracy of the answers and be prepared to explain, to the extent necessary, the basis for the answers at the hearings. Responses shall be provided no later than April 20, 2012.

The following question(s) are directed to witness Frank Neri (USPS-T-4).

1. In response to POIR No. 5, question 11, witness Neri confirmed that, during a shift, employees may work in operations other than the 5 areas included in his analysis. POIR No. 5, question 11 also requests disaggregated workhours for all operations (including those operations excluded from witness Neri's analysis) at facilities identified in library reference USPS-LR-N2012-1/50 during the sampled time period. Witness Neri responded that these data are not available.

<sup>&</sup>lt;sup>1</sup> Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services, December 5, 2011 (Request).

<sup>&</sup>lt;sup>2</sup> The Postal Service may redirect questions as necessary to provide a complete response, including the provision of institutional responses, if necessary.

- a. Please explain how long the Postal Service retains workhour data disaggregated by facility, by hour, and by operation.
- b. Please identify a time period of at least 14 days for which disaggregated workhour data are available.
- c. Please provide these data for the time period identified in response to(b) of this question.
- d. Please provide the analysis performed in library references USPS-LR-N2012-1/49 and USPS-LR-N2012-1/50, using the time period identified in response to (b) and the data provided in response to (c) of this question.
- In response to POIR No. 1, question 16(b), the Postal Service provided library reference USPS-LR-N2012-1/NP10, which contains disaggregated FY2010 MODS data. Please provide the same data for FY2011.

The following question(s) are directed to witness Cheryl D. Martin (USPS-T-6).

 Please provide a crosswalk of Highway Contract Route Id (HCRID), Route Number, and Budget Account Number (Finance Number) for all of the Postal Service's transportation routes, covering all possible combinations in the following table format.

HCR ID	Budget Account Number	Route Number

- 4. Please refer to the response to POIR No. 4, question 5(b), attachment Excel file 'Resp.POIR4.Q5b (Martin).xls,' worksheet 'Plant to Plant Cost'. Please provide the key (definition) for data provided in rows 862 to 1,575 under column A of 'Plant to Plant Cost' worksheet.
- 5. Please refer to the response to POIR No. 4, questions 5(b) and 6(b), attachments 'Resp.POIR4.Q5b (Martin).xls' and 'Resp.POIR4.Q6b (Martin).xls.'
  - a. Please confirm that worksheet 'Plant to Plant Cost' in 'Resp.POIR4.Q5b (Martin).xls' contains all plant-to-plant routes. If not, please provide all plant-to-plant routes and trips in the same format as attachment 'Resp.POIR4.Q5b (Martin).xls.'
  - b. Please confirm that worksheet 'Plant to Post Office Cost' in 'Resp.POIR4.Q6b (Martin).xls' contains all plant-to-post office routes. If not, please provide all plant-to-plant routes and trips in the same format as attachment 'Resp.POIR4.Q6b (Martin).xls.'
- 6. Please refer to PRC-LR-N2012-1/NP1, filed under seal. The Excel file 'AMP Studies Transportation.xls,' in the library reference contains transportation data assembled from AMP studies provided in library reference USPS-LR-N2012-1/NP16. It is organized into seven worksheets corresponding to seven Areas. Each worksheet provides a list of routes for losing and gaining facilities, and information for each route including current and proposed annual mileage, cost, cost per mile, and route number by area and facility as presented in each AMP study.
  - a. Please identify the type of transportation category (Inter-Area, Inter-Cluster, Inter-P&DC, Intra-P&DC, Inter-NDC (formerly Inter-BMC), and Intra-NDC (formerly Intra-BMC) for each route in the table format shown below.

b. It appears that some of the transportation route numbers provided in the AMP studies are non-standard route numbers and some are new routes. For example, route numbers are typically 5-digit numbers, whereas the routes in the AMP studies are identified by route numbers of various lengths, some of which appear to have notes incorporated. Please also provide the correct route numbers, wherever necessary, under column "Correct Route Number" in the table.

Losing Facility	Route Number	Correct Route Number	Current Annual Mileage	Current Annual Cost	Current Cost Per Mile	Proposed Annual Mileage	Proposed Annual Cost	Proposed Cost Per Mile	Type of Transportation Category	Gaining Facility	Route Number	Correct Route Number	Current Annual Mileage	Current Annual Cost	Current Cost Per Mile	Proposed Annual Mileage	Proposed Annual Cost	Proposed Cost Per Mile	Type of Transportation Category
XYZ P&DC	xx		XX	XX	XX	XX	XX	xx		ABC P&DC	уу		уу	уу	уу	уу	уу	уу	
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The following question(s) are directed to witness Elmore-Yalch (USPS-T-11).

- 7. Please refer to USPS-N2012-1/NP1, files "First-Class Mail\_LargeCommercial\_Final\_DataFile\_USPS-N2012-1.NP1.sav", and "First-Class Mail\_SmallHome\_Final\_DataFile\_USPS-N2012-1.NP1.sav". In response to PR/USPS-T11-7, the Postal Service indicated that "original data...are not included in the data file because in their raw form are not useable." Please provide a dataset that contains the answers to the following questions and can be matched to the files: "First-Class Mail\_LargeCommercial\_Final\_DataFile\_USPS-N2012-1.NP1.sav", and "First-Class Mail\_SmallHome\_Final\_DataFile\_USPS-N2012-1.NP1.sav".
  - a. From the Large Business Survey: Q2A\_2012, Q2B\_2012, Q2C\_2012,
     Q2D\_2012, Q2DD\_2012, Q2E\_2012, Q2F\_2012, Q2G\_2012, Q5B, Q6B
     Q7B, Q8B, Q8D, Q9B, Q10B, Q11B
  - b. From the Small/Home Business Survey: Q2A\_2012, Q2B\_2012,
     Q2C\_2012, Q2D\_2012, Q2DD\_2012, Q2E\_2012, Q2F\_2012, Q2G\_2012,
     Q5B, Q6B, Q7B, Q8B, Q8D, Q11B

Ruth Y. Goldway Presiding Officer